



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

JD:GKS  
F. #2016R00088

*271 Cadman Plaza East  
Brooklyn, New York 11201*

February 13, 2017

By ECF and Hand

Officer Kristen Ann Bossack  
United States Probation Department  
Eastern District of New York  
147 Pierrepont Street  
Brooklyn, NY 11201

Re: United States v. Adene Reid  
Criminal Docket No. 16-50 (DLI)

Dear Officer Bossack:

The government respectfully submits the following factual objections to the Presentence Investigation Report ("PSR") dated February 1, 2017.

- ¶ 2 – The PSR indicates that the government will seek forfeiture. The government, however, will not seek forfeiture per the plea agreement in this case.
- ¶ 3-4 – The PSR indicates that the defendant Adene Reid and co-defendant Charles Thomas walked into an AT&T Store located at 1169 Liberty Avenue in Brooklyn, NY on January 18, 2016 for purposes of robbing the store. The evidence, however, indicates that defendant Reid and an unknown co-conspirator walked into the AT&T Store and proceeded to rob the store. The evidence further indicates that co-defendant Charles Thomas' role in the robbery was to drive the getaway vehicle from the scene. The government therefore respectfully requests that the PSR be amended to reflect: (1) the participation of three individuals overall in the

robbery; and (2) the fact that defendant Reid was physically in the AT&T store with an unknown co-conspirator.

Very truly yours,

ROBERT L. CAPERS  
United States Attorney

By: /s/ G. Karthik Srinivasan  
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cc: Clerk of Court (DLI) (by ECF and Hand)  
Alan Seidler, Esq. (by ECF)